



# SAINT LOUIS UNIVERSITY

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UNIVERSITY

## Policy for Externally Sponsored Programs Grants, Contracts, and Agreements

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Responsible University Officer: Vice President for Research

### 1.0 INTRODUCTION

Saint Louis University will seek and accept sponsored awards to support its mission in research, instruction, and public service.

The Division of Research Administration at Saint Louis University assists University personnel in securing and managing external funding to support research, scholarly, programmatic, and other activities.

Saint Louis University must affirmatively accept sponsored awards. Once an award has been accepted, the University will fulfill its obligations under the award.

The Office of Sponsored Programs Administration (OSPA), a unit within the Division of Research Administration, is responsible for the post-award administration of all sponsored awards and contracts, memoranda of understanding, consortium agreements, and subawards. This is necessary to ensure that all administration of sponsored awards is compliant with institutional policies and all relevant regulations.

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Principal Investigators (PI) are individuals who are named in the award or contract in which the sponsor has named them PI.

### 2.0 PURPOSE

This policy applies to:

1) All Saint Louis University research, scientific, professional, and other activities

2) All grants or other remuneration by an organizational entity external to the institution. These agreements can be grant applications, research agreements, sponsored research agreements, subcontracts/subawards or consulting agreements. All agreements entered into between Saint Louis University as the applicant and the external entity or the recipient. The Principal Investigator (PI) serves as the Technical Representative. Agreements that name the Principal Investigator as a Party to the agreement, or those for which the Principal Investigators negotiate terms and conditions or sign an agreement on behalf of the institution will not be binding on the institution.

In order to ensure the proper adjudication for all grant applications and contracts, this policy sets forth the procedures and timelines necessary to ensure that grant applications and contracts are crafted in the best interests of the Institution and the Principal Investigator.

Key to proper adjudication is sufficient time for ORDS review and negotiation. Grant applications (multiple institution investigator applications) prior to the deadline date. Contracts and subcontracts require on average one month to negotiate between both parties. ORDS and the Division of Research Administration reserve the right to refuse to accept grant applications and contracts that are submitted with inadequate timelines.

**3.0 DEFINITIONS**

3.1 **Authorized University Representative:** An employee who is recognized by Saint Louis University as an official representative of the institution in all grant and contract agreement activity with external sponsors.

3.2 **Business Days:** The standard University business days, Monday through Friday, 9:00 a.m. to 5:00 p.m.

3.3 **Consulting Agreement:** A formal agreement to be used when an individual enters into an agreement with the institution for the performance of a specific project or significant programmatic effort, and whose annual reportable effort exceeded is not more than six (6) percent in one budget period. ORDS makes the determination if a consulting agreement is the adequate contractual mechanism to use. The University's Standard Services Agreement can be used when the determination is made.

STL faculty may enter consulting agreements when similar conditions are met and

**3.4. Cost Share** (also referred to as matching funds) is defined as:

image, an in-kind contribution that has been specifically committed to a project, whether voluntary or mandatory, represents a binding obligation on Saint Louis University and is considered an in-kind expense.

**3.5 Electronic Submission:** Delivery of a proposal to a sponsor using the World Wide Web or Internet.

**3.6 Fee for Service Agreements:** A formal contractual agreement covering the provision of routine tasks for a fixed fee, during times of excess capacity, with no contribution to programmatic direction or publication. All data and results are owned by the sponsor. Compensation for work completed is listed as a single sum, with no detailed budget breakdown provided to the sponsor or as exhibit.

**3.7 Gifts:** External funding provided by Donors who have a clear philanthropic intent and no expectation of performance from the University other than expending the funds as directed. Generally, gifts do not require a deliverable product.

**3.8 Institution:** For the purposes of this policy, the term *Institution* will refer to Saint Louis University.

**3.9 Principal Investigator (PI) or Project Director (PD):** An individual who assumes full technical and fiscal responsibility for a sponsored program, including the supervision of other key personnel, research assistants, students, and staff. A Principal Investigator must have sufficient experience to responsibly manage the project and must be an employee of the University. Throughout this policy, the term *Principal Investigator (PI)* will also refer to the term *Project Director (PD)*.

**3.10 Paper Submission:** Delivery of a proposal to a sponsor through the U.S. Postal Service, a commercial carrier, or by facsimile.

**3.11 Scope of Work:** A written statement specifying the tasks (including deliverables) to be completed for a specific project, cost, and period of performance.

**3.12 Sponsor:** Any governmental agency, private foundation, corporation, or association that provides financial project support.

**3.13 Sponsored Program:** A research project, program, scholarly activity, or community service project for which Sponsor has provided financial support and for which a formal written agreement exists.

A Sponsored Program has the following characteristics:

- Activities relate to a proposal funded by an entity outside the University.

- The Project is funded for a specific purpose.;  
It is an exchange transaction subject to the provisions in article 100 and funding provided to the University
- It is executed by an award, contract, cooperative agreement, memorandum of understanding, or other formal mechanism.
- Its purpose is to support research, scholarly, instructional or public service activity.;
- A specific person is named to oversee/conduct the work (PI)

that may be revised.

- The sponsor may have a direct interest in the development and ownership of the intellectual property resulting from the activity.
- The Sponsor requires financial reporting on an annual or final basis.

**3.14. Sponsored Research Agreement:** A formal contractual

an outside entity where SLU is engaged in full programmatic effort for a specified scope of work, budget and project performance period, and for which publication and intellectual property rights must be guaranteed

**3.15. Standard Services Agreement:** the formal contractual agreement to be used when

CRDS determines that the work of an entity external to SLU to fulfill the scope of

impact the programmatic direction of the overall

**3.16. Sponsored Research Agreement:** A formal contractual agreement with a specific purpose

projects. Tasks to be performed contribute to the programmatic direction of the overall project, and there is reportable effort. The term does not apply to the procurement of supplies and research equipment

**3.17. Transmittal Form:** An electronic document housed on eRS@SLU that is completed

by the PI with all necessary, relevant information and documentation for the submission of the proposal to an external agency, including the electronic signatures of the PI/PP, Department Chair(s), School/College Dean(s), and the Office of Research Development and Services Authorized University Representative. Both parties indicate they have reviewed and assented to the terms and conditions of the proposal submission.

**3.18. Student Loan Activity:** Funding resulting from student loans guaranteed by the

federal government with federal government requirements as stated in 34 CFR 1.100

3.19 Timely: Occurring no later than two (2) months after the end of the month of the original transaction

## 4.0 POLICY

4.1 All Awards are sought in the name of and awarded to Saint Louis University.

Faculty and individual faculty staff are not authorized to submit applications for grants or contracts, nor are they authorized to accept awards, contracts, subcontracts, or agreements on behalf of the University. The authorized University representative for submission of proposals and acceptance of grants and contracts is the Director of Research Development and Sponsored Programs.

4.3 All proposals to external funding sources that do not have a clear intent (including no expectation of performance) must be submitted to ORDS for review. Proposals that are consistent with the definition of a "gift" as defined in FASB 116 and FASB 117 will be forwarded to the Office of Development to be processed as gifts. Please see the "Policy on the Distinction between Gifts and Sponsored Programs" for further guidance.

4.4 ORDS makes official determination of what type of agreement mechanism should be used, depending upon a review of the terms of the agreement, weighted by: presence of a deliverable; time/effort; external entities; and other factors.

4.5 If a sponsor requires direct submission (e.g., a fellowship or scholarship), the proposal must still be processed through normal procedures as described above and will be submitted by the PI on behalf of Saint Louis University.

4.6 It is the policy of Saint Louis University that all awarded projects are administered through the Office of Sponsored Programs Administration (OSPA). The Director of Sponsored Programs Administration is the University's official contact for sponsor awards accepted by the University. Deans, Department Chairs, and other faculty or staff members are not authorized to submit financial budgets, reports, estimates, or invoices to award sponsors. This policy does not include clinical billing invoices,

including clinical trials, which will be submitted to sponsors by the Clinical Trials Office.

Submitted proposals requesting supplemental pay must clearly state the

#### 4.9. Technical/Programmatic negotiations (Sponsor of Award) with the

#### 4.10. Financial/Procurement negotiations (Sponsor of Award) with the

4.10.1 Deans and Department chairs are required to provide appropriate resources to execute awards that have been accepted in their schools and departments. This includes personnel and other items deemed as indirect costs that may not be charged directly to awards.

4.10.2 Direct cost-sharing commitments as well as implied cost sharing should be resources exist or will exist to fulfill the commitment on all department sponsored awards.

4.10.3 DPs should execute the awards consistent with the signed agreement. Costs should not be incurred before the signed agreement is in place unless an Award has been established. (COP, DP, S, J, R, P, W, T)

4.10.4 Costs should not exceed the awarded budget. Over-cost accounts must be cleared by the next monthly review unless the sponsor has provided documentation that clearly states their intent to provide additional funding in a timely manner.

### 4.11 Expenditures of Funds

4.11.1 All expenditures of funds received from an award must be made in accordance with standard university policies, cost accounting standards, and OMB Circulars.

4.11.2 All Sponsored awards will be administered consistent with Federal rules. Financial commitments or expenditures are not to be made before an award is in place unless certain circumstances if the expenditures are backed by a commitment of funds from the manager of a currently existing source, and such pre-award expenditures are allowable under the terms of the anticipated award. Expenditures may not be made after an award has terminated.

4.11.3 Expenditures should be recorded correctly and only once. Costs should be recorded based on the type of item and the nature of the transaction. The SPO

SPO should be consulted if any uncertainties exist as to the allowability and proper recording of any expense.

#### 4.11.4 Transfers onto grant funds should be made for a

must be removed from the grant funds in a timely manner. See policy.

transfers of income and expense items for further guidance.

### 4.12 Property and Equipment Purchased on Sponsored Awards

4.12.1 All property or equipment obtained from or purchased with funds from external sponsors shall receive the same care and safeguards as all other University property.

4.12.2 Property or equipment purchased with funds from external sponsor must be inventoried, tracked and disposed of in accordance with the terms and conditions of the external sponsor's requirements and OMB Circulars.

4.12.3 The OSP must be consulted prior to the disposition of any non-expendable sponsor-owned property and/or equipment.

4.12.4 PIs leaving Saint Louis University who wish to take equipment purchased on their federal award are not to transfer the equipment. See OMB Circular rules. See Policy "Federal Equipment" for further guidance.

4.12.5 PIs entering Saint Louis University with equipment purchased with Federal Funds from a previous institution must transfer equipment per University and OMB Circular rules. See Policy "Federal Equipment" for further guidance.

### 4.13 Required Reports and Billings

4.13.1 As stated in 4.6 above, the OSP will submit all financial reports and invoices to award sponsors.

4.13.2 PIs are responsible for submitting all required technical and progress reports that are programmatic in nature. Reports must be completed and submitted on time as agreed upon in the award document and consistent with OMB Circulars. PIs should also submit reports for documentation purposes.

### 4.14 Required Certifications

PI's must ensure that required certifications are completed for grants under their supervision. This includes effort reports for salaries charged to their grants, project end certifications consistent with OMB Circular A-21 Section K, and quarterly certification of expenses.

#### 4.15 Required Review of Expenses

on a monthly basis. The review is indicated by the PI signature and date completed. Monthly review may be delegated to a knowledgeable assistant but the PI must still sign and date the completed work to ensure completion.

#### 5 Institutional Responsibilities

The Office of Research Development and Services will:

- Review all proposals for external support and for any necessary changes to ensure compliance with university policies and sponsor regulations;
- Authorize and sign necessary institutional letters in accordance with the timelines set forth in Grant 10.

#### 5.2 Principal Investigator Responsibilities

##### 5.2.1 Pre-Award Responsibilities

Services as early as possible (but not less than 5 full business days prior to deadline for grants, 10 full business days for multi-institutional applications, or one month for contracts) prior to submission of proposals to or entering

Contract discussions with potential sponsor;

Consult with the Office of Research Development and Services when questions about the type of agreement/gift arise, prior to proposal submission or contract negotiations;

- Discuss scope of work with potential sponsor, but not terms and conditions to include type of agreement or Facilities and Administrative rate;
- Complete proposal/application in compliance with sponsor's guidelines and requirements;
- Develop project design;
- Attend to all compliance issues including, but not limited to, export controls;

potential or real conflicts of interest in research;

- Obtain all necessary institutional approvals for submission of a proposal (e.g., Chairperson, Dean, ORS, Finance, and any other required approvals);
- Submit annual conflict of interest in research disclosure materials and update any apparent or actual conflict of interest in research issues that may arise between annual disclosures;



#### ESSENTIAL EXPENSE ITEMS

- Develop accurate proposal budgets containing only allowable, allocable, and essential expense items
- Determine effort for key personnel;
- Notify Chair and Dean of any released time or absences that will result if the proposal is funded and obtain the necessary approvals;
- Coordinate required cost sharing or matching funds (including tuition waivers) with ORDS, and obtain appropriate approvals;
- Obtain scope of work, budget, and institutional approval from any external sponsor, and obtain approval from the sponsor's academic unit; ORDS recommends basing on this proposal then (2) submit in advance of deadline to accommodate other institutions' processing;
- Submit the proposal along with the sponsor guidelines, subcontract requirements, and other applicable requirements to the sponsor's academic unit, investigators, and all appropriate Chairs and Deans to ORDS for review and approval in accordance with the timelines specified in Section 6.0 of this document; and
- If paper submissions are required by the sponsor, assume responsibility for submitting the correct number of copies to the sponsor and meeting the application by the agency deadline after review and approval by ORDS.

#### 5.2.2 Post-Award Responsibilities

- Supervise and maintain progress of the technical aspects of the project to ensure the responsible and ethical conduct of activities according to award document and in compliance with University, sponsor, and local, state, and federal government requirements;
- Devote effort to the project at the level agreed to with the sponsor;
- Ensure that all compliance issues are met for all key personnel including, but not limited to, conflict of interest in research reporting; effort reporting, and training in the responsible conduct of research, protection of human subjects, animal care and use, and environmental safety;
- Maintain quality, accurate records of research for a period not less than sponsor's requirements;
- Ensure that support staff attend training sessions and monthly meetings conducted by ORDS and OSP to keep up on grant administration issues;
- Maintain research integrity, including the management of activities of project personnel;
- Ensure responsible management of expenditures in accordance with awarded budget that are allowable, allocable, and essential, and ensure that any budget changes or alterations are done in accordance with sponsor and University guidelines (excessive expenditures are the responsibility of the PI/PD and will be charged to a departmental account);
- Select, train, and evaluate project staff and provide necessary input and guidance to all students, post-docs, staff, and research assistants to ensure the integrity of the project and compliance with sponsor and University guidelines;
- Manage acquisition of equipment, supplies, and personnel according to

—sponsor guidelines; University policies and procedures; and OMB Circulars;

- Disclose and subsequently manage intellectual property with the Office of Technology Management (OTM);
- Work with the Office of Sponsored Programs Administration on required

financial close-out of project at end of grant period; and

per sponsor Agreements, including:

- Certifying time and effort on a semi-annual basis,
- Certifying expenditures quarterly,
- Submitting annual conflict of interest disclosures,

Monitoring conflicts of interest in response to

changes in actual or apparent conflicts,

- Analyze and publish findings.

### 5.2 Departmental Chair and School/College Dean Responsibilities

- The Department Chair(s) and School/College Dean(s) or other appropriate unit head(s), must review and approve the Transmittal Form and the proposal in a timely manner, paying particular attention to any cost sharing that is included in the proposal budget, especially as it relates to the percentage of effort that a faculty member is devoting to the project. By signing the involvement of the PI and other investigators and students (including released time), the budget, cost sharing, and any other considerations described in the

Provide adequate administrative resources to conduct proposed awards.

- Provide appropriate staffing to fulfill administrative requirements grants related activities;
- Ensure that cost sharing commitments do not exceed available resources during the performance of the award.
- Require support staff to attend training and monthly meetings provided by ORDS and OSP on Grant Administration subjects.

Provide clear accountability and sanctions to PIs, faculty and staff who do not comply with

University Policies and Procedures and Procedures.

## 6.0 PROPOSAL/CONTRACT SUBMISSION GUIDELINES

6.1 The policy specifies that all proposals must be submitted in accordance with the following timelines:

Electronic and Paper Grant

At least five (5) full business days before the sponsor deadline for

Application Submissions *(including*

compliance review – (Medical Center proposals must first receive budget review from the Medical Center Finance Office – Schedule II-B-002

Final (ready to submit) versions of proposals must be submitted to ORDS

the sponsor's deadline date to ensure submission.

Once released to ORDS, proposals will be submitted in the order they are

On-time submission cannot be guaranteed for any application released to ORDS after the five- or ten-business day internal review deadline.

guidelines, make sure that the proposal adheres to both the sponsor's

guidelines and SI IP's internal guidelines, and to allow time for

corrections to be made to a proposal if errors are found. Additionally,

it allows for sufficient time for both the Chair and Dean to review the

complex and often multiple revisions of a grant are required before submission. To promote a smooth submission please have the

- A summary of the proposed project,
- The name of the funding agency and program,
- Copies of program guidelines, RFPs, RFAs, etc.,
- The deadline for submission,
- Special needs such as matching funds, tuition waivers, or use of institutional

resources.

- The need for protection of human subjects, animal care and use, biohazards, or
- Evidence that the appropriate unit heads support the project

NOTE: When funding is sought from an individual, please contact the Office of the Associate Vice President for Development at 077-2206, DuRoius Hall 207

#### 6.1.2 PIs must develop budgets that are accurate, reasonable, and adequate for the proposed project.

33, and Civil Circular A-71, it is the policy of Saint Louis University that only

allowable costs are included in proposal budgets, including facilities and administrative costs specified in the University's current negotiated rate agreement, or a lesser rate formally approved by the Vice President for Research. PIs who do not have sufficient expertise to complete budgets within these guidelines should work closely with ORDS staff and/or the Medical Center Finance Office in this process.

#### 6.1.3 Modular Budgets and Expanded Authority

must include detailed account budgets that roll up to the submitted aggregate amount.

Budgets must be crafted and submitted with accounts that are consistent with the nature

accounts.

#### 6.1.4 Obtain Institutional Review and Approvals

electronic proposal submissions:

1. The PI must complete the electronic Transmittal Form on eRS, which includes:

a) obtaining the signatures of all academic unit Chair(s) and Dean(s). If institutional matching funds are included as part of the proposal budget, written approval from the authorizing Vice President must also be included as an attachment on the Transmittal Form, authorizing these funds.

- b) completing the "Conflict of Interest in Research" certification that is required by federal regulation.

2. The PI then attaches any relevant sponsor guidelines and the proposal to the Transmittal Form for approval routing.
3. The completed Transmittal Form, sponsor guidelines, and proposal must be submitted to ORDS in accordance with the required timelines specified in Section 7.0 of this document. Any cover sheet or application forms requiring the

Transmittal Form in the "Attachment Status" section of eRS when submitted to

ORDS. Deans, Department Chairs, and individual faculty and staff are not

Submit the proposal to the Agency

#### Submissions not Requiring Authorized Organizational Representative to Submit

If the sponsor does not require ORDS to submit the application, the PI is responsible for sending the correct number of copies of submitting received by the sponsor's deadline (postmark or receipt).

Awards for proposals that have not undergone proper review may encounter compliance problems with University or sponsor policies. If satisfactory terms and conditions can be negotiated and compliance is assured, the University may choose to accept an award that had not been reviewed before submission. However, the University reserves the right to decline an award that is not compliant with institutional, sponsor, or

#### Submissions Requiring Authorized Organizational Representative to Submit

In the case of electronic submissions, the Authorized University Representative must electronically sign and submit the proposal. Agencies of information.

## 6.2 Award Acceptance

Usually, notification of an award is sent to the University. If is sent directly to the PI, a copy must be sent immediately to ORDS for processing. PI cannot incur expenses without a University-assigned fund number and budget for a grant or contract. All external funds within the scope of this policy must be set up in a sponsored program account.

Grant and contract awards are made through the Office of Sponsored Programs. An authorized University representative must sign a contract to accept the award. Deans, Department Chairs, and individual faculty or staff members are not authorized to sign award documents. (An exception to this is a fellowship that is paid directly to a faculty member and not to the University. Faculty members who accept this type of award, although they must still submit the Transmittal Form).

ORDS or Medical Center Finance and business managers will work with the Sponsored Programs Office to establish a new fund number for a newly awarded grant or contract.

The fund will include a line-item budget in accordance with the award budget, funding agency regulations, University guidelines and Cost Accounting Standards.

In order to fulfill audit requirements, all official correspondence on contract with the

Services of the Office of Sponsored Programs Administration.

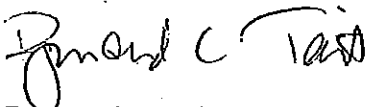
Any significant changes to grants need to be brought to the attention of ORDS and

- Changes in effort devoted to the project (see Effort Reporting Policy)
- Budget revisions,
- Extension of grant period, and
- Change in scope of the project.

Any questions regarding this policy or the procedures mentioned herein should be directed to the ORDS office: 314-977-7742

This policy was developed by: The Division of Research Administration

This policy has been approved by:



Raymond C. Tait, Ph.D.  
Vice President for Research  
Saint Louis University

July 1, 2011  
Date

EFFECTIVE DATE	VERSION NUMBER	MODIFICATION
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REVISION